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5 Attorneys for BARRY MILGROM,
Trustee in Bankruptcy
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8 UNITED STATES BANKRUPTCY COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN FRANCISCO DIVISION

11 In re

12 JAMES JIN QING LI
aka
13 JIN QING LI,
dba JAMES LI P.E.,
14 Debtor.
15
16

Case No. 12-33630 HLB
Chapter 7
Hon. Hannah L. Blumenstiel

CONDITIONAL NON-OPPOSITION

Date: May 13, 2013
Time: 2:00 P.M.
Crtrm.: 23
235 Pine Street
San Francisco, CA 94104

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18 Barry Milgrom, Trustee in Bankruptcy of the estate of the above-named Debtor, has no
19 opposition to the Motion for Relief from Stay filed by creditor Stephanie Rosen and Mike Rosen;
20 provided, however, that any order entered provides as follows:

21 “1. Movants Stephanie Rosen and Mike Rosen (“Movants”) are hereby granted relief
22 from the automatic stay imposed pursuant to Bankruptcy Code § 362(a) for the following
23 purposes:

- 24 A. to defend the appeal before the California Court of Appeal, First Appellate
25 District, in Case No. A-137146 brought by the Debtor;
26 B. to pursue post-judgment efforts to collect the judgment issued by the Superior
27 Court of California, County of San Mateo, in Case No. CIV-440930;

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- 1 C. to take those actions necessary, including the pursuit of fraudulent
2 conveyances, to pursue any assets, either disclosed or not disclosed, which are
3 subject to Movants' liens;
4 D. to enforce Movants' judgment against any assets not disclosed but which may
5 be subject to Movants' judgment; and
6 E. to the extent any assets are recovered in excess of Movants' judgment liens, any
7 such assets received shall be turned over to the Trustee, subject to reasonable
8 attorneys' fees in favor of Movants, to be determined by the Bankruptcy
9 Court."

10
11 DATED: May 9, 2013

Respectfully submitted,

12 McKENNA LONG & ALDRIDGE LLP
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14 By: /s/Michael A. Isaacs, Esq., CSBN 99782
15 MICHAEL A. ISAACS
16 Attorneys for BARRY MILGROM,
Trustee in Bankruptcy

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PROOF OF SERVICE

In re JAMES JIN QING LI *aka* JIN QING LI, *dba* JAMES LI P.E.

Case No. 12-33630 HLB

Judge: Hannah L.Blumenstiel

Dept: 23

At the time of service, I was over 18 years of age and **not a party to this action**. I am employed in the County of San Francisco, State of California. My business address is Rincon Center II, 121 Spear Street, Suite 200, San Francisco, CA 94105-1582.

On May 9, 2013, I served true copies of the following document(s) described as

CONDITIONAL NON-OPPOSITION

on the interested parties in this action as follows:

SERVICE LIST

Office of the United States Trustee 235 Pine Street, Suite 700 San Francisco, CA 94104	Lawrence D. Miller 1200 Sixth Avenue, Suite 300 Belmont, CA 94002
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BY MAIL: I enclosed the document(s) in a sealed envelope or package addressed to the persons at the addresses listed in the Service List and placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with McKenna Long & Aldridge LLP's practice for collecting and processing correspondence for mailing. On the same day that the correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on May 9, 2013, at San Francisco, California.

/s/Alissa V. Worthing
ALISSA V. WORTHING

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